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## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

STEPHEN GOLASH AND SUSAN GOLASH, Plaintiffs,

VS.

C.A. NO: 1:04-CV-12414-GAO

## RESPONSE OF DEFENDANT HOUSEHOLD FINANCE CORPORATION II TO PLAINTIFFS' MOTION TO REMAND

Defendant, Household Finance Corporation II ("Household"), hereby responds to the Plaintiffs' Motion to Remand as follows:

- 1. Without acknowledging that Household's assent to the original removal was required, Household hereby assents to the original Motion to Remove this matter to federal court.
- 2. In response to Plaintiffs' Motion to Remand the case to state court, Household respectfully opposes the Motion to Remand and Household and adopts the arguments set forth in the Memorandum in Opposition to the Motion to Remand filed on behalf of defendants Patricia A. Davis, Richard J. Volpe, and Shectman, Halperin & Savage, LLP.

Respectfully submitted,
Defendant,
HOUSEHOLD FINANCE CORPORATION II

By its attorneys,

John A. Markey, Jr., Esquire

Moses Smith & Markey

50 Homes Wharf

New Bedford MA 02740

(508) 993-9711

DATED: January 4, 2005

## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that he caused a true and accurate copy of the within Answer to be served on this 4<sup>th</sup> day of January 2005, via facsimile and regular mail, postage prepaid, upon the following counsel of record:

Patricia A. Szumowski, Esquire Graham & Albano, P.C. 100 Russell Street P.O. Box 377 Hadley, MA 01035-0377

Joseph Berman, Esquire Berman & Dowell 210 Commercial St. Boston, MA 02109

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